UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----X

DANNY COLON,

Plaintiff, :

Dkt. No. 12-cv-9205 (JMF)

-against-

NOTICE OF MOTION TO UNSEAL GRAND

THE CITY OF NEW YORK, et al.,

JURY MINUTES

Defendants.

-----X

PLEASE TAKE NOTICE that upon the annexed Declaration of Joel B. Rudin, dated July 22, 2014, the exhibits attached thereto, and the Memorandum of Law submitted herewith, and upon all prior pleadings and proceedings had herein, Plaintiff Danny Colon with move this Court, before the Honorable Jesse M. Furman, United States District Judge, at the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York 10007, for an order unsealing and directing the New York County District Attorney's Office to disclose the grand jury proceedings in *People v. William Perez* (N.Y. County Indictment Number 591/90).

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, are to be served no later than August 5, 2014.

Dated: New York, New York July 22, 2014

JOÈL B. RUDIN

1345 Avenue of the Americas, 2<sup>nd</sup> Floor

New York, New York 10105

(212) 752-7600

jbrudin@rudinlaw.com Attorney for Plaintiff

TO: All Counsel (By ECF)

Sarah Hines, Esq. (By ECF) Assistant District Attorney